IN THE UNITED STATES PATENT & TRADEMARK OFFICE

In re Chen	)	Serial No.: 10/617,526
	)	
Applicant,	)	Docket No.: AUS920030523US1
	)	
For: Traditional Chinese / Simplified Chinese	)	Art Unit: 2626
Character Translator	)	
	)	
	)	Confirmation No.: 3551
	)	
Filed: July 10, 2003	)	Examiner: Neway

RESPONSE TO NOTIFICATION OF NON COMPLIANT APPEAL BRIEF DATED MARCH 26, 2008

April 2, 2008

Ms Appeal Brief – Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

In response to the Notification of Non-Compliant Appeal Brief dated March 26, 2008, please replace Appeal Brief section V (summary of claimed subject matter) with the following section V (pages 2-8 of this paper) and Appeal Brief section VII (arguments) with the following section VII (pages 9-28 of this paper). Appellant believes this Amendment places the Appeal Brief into compliance with 37 C.F.R. § 41.37. Specifically, this Amendment adds subject matter summaries for claims 30, 38, 46, and 53, and corrects issues with the argument section's discussion of the third and fourth grounds of rejection. Therefore, Appellant respectfully requests reconsideration of the Appeal Brief.

V. Summary of Claimed Subject Matter

The following provides a concise explanation of the subject matter defined in each of the separately argued claims involved in the Appeal as required by 37 C.F.R. § 41.37l(1)(v). The features are identified by corresponding references to the specification and drawings where applicable. It should be noted that the citations to passages in the specification and drawings for each feature do not imply that the limitations from the specification and drawings should be read into the corresponding claim element. Rather, this summary is provided for the convenience of the Board.

Embodiments of the invention according to claim 1 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, copying (FIG. 3, element 204; Specification 8:22-9:16 and 12:10-13:4) a Simplified Chinese character into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode (FIG. 3, element 206; Specification 8:22-9:16) to determine a Traditional Chinese character equivalent (FIG. 3, element 214; Specification 9:17-10:13) of the Simplified Chinese character (see e.g., FIG. 3, element 212; Specification 9:17-10:5);

using Unicode to translate (FIG. 3, element 214; Specification 9:17-10:13) the Simplified Chinese character into an accented Pin Yin word and an English word; and

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying

(FIG. 3, element 230; Specification 11:18-21) the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word (Spec. 7:15-16), a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 9 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, copying (FIG. 3, element 204; Specification 8:22-9:16 and 12:10-13:4) a Traditional Chinese character into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode (FIG. 3, element 206; Specification 8:22-9:16) to determine a Simplified Chinese character equivalent (FIG. 3, element 218; Specification 10:14-23) of the Traditional Chinese character (*see e.g.*, FIG. 3, element 216; Specification 10:14-23); and

using Unicode to translate (FIG. 3, element 218; Specification 10:14-23) the Traditional Chinese character into accented Pin Yin word and an English word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin (Spec. 7:15-16) word, a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 17 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, entering (FIG. 3, element 204; Specification 8:22-9:16 and 12:10-13:4) a Pin Yin word into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode to translate (FIG. 3, element 222; Specification 11:1-7) the Pin Yin word into a Traditional Chinese character, a Simplified Chinese character, and an English word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin (Spec. 7:15-16) word, a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 24 provide a computer implemented method comprising:

using a computer having a display and connected to the Internet, entering (FIG. 3, element 204; Specification 8:22-9:16 and 12:10-13:4) an English word into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

using Unicode to translate (FIG. 3, element 226; Specification 11:8-14) the English word into a Traditional Chinese character, a Simplified Chinese character, and an accented Pin Yin (Spec. 7:15-16) word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the term as a Traditional Chinese character, an unaccented Pin Yin word (Spec. 7:15-16), a hybrid Pin Yin word (Spec. 7:12-14), and an English word.

Embodiments of the invention according to claim 30 provide a program product operable on a computer, the program product comprising:

a computer-usable medium;

wherein the computer usable medium contains encoded instructions executable on a computer having a display and connected to the Internet comprising:

instructions for receiving (FIG. 3, element 204 and 212; Specification 8:22-9:16, 9:17-10:5, and 11:22-13:4) a Simplified Chinese character into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

instructions for using Unicode (FIG. 3, element 206; Specification 8:22-9:16) to determine a Traditional Chinese character equivalent (FIG. 3, element 214; Specification 9:17-10:13) of a Simplified Chinese character (*see e.g.*, FIG. 3, element 212; Specification 9:17-10:5); and

instructions for using Unicode to translate (FIG. 3, element 214; Specification 9:17-10:13) the Simplified Chinese character into accented Pin Yin word and an English word;

instructions for, responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word (Spec. 7:15-16), a hybrid Pin Yin word (Spec. 7:12-14), and an English word.

Embodiments of the invention according to claim 38 provide a program product operable on a computer having a display and connected to the Internet, the program product comprising:

a computer-usable medium containing instructions encoded thereon and executable on a computer having a display and connected to the Internet, the instructions comprising:

instructions for receiving (FIG. 3, element 204 and 216; Specification 8:22-9:16, 10:14-23, and 11:22-13:4) a Traditional Chinese character into an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

instructions for using Unicode (FIG. 3, element 206; Specification 8:22-9:16) to determine a Simplified Chinese character equivalent (FIG. 3, element 218; Specification 10:14-23) of the Traditional Chinese character (see e.g., FIG. 3, element 216; Specification 10:14-23); and

instructions for using Unicode to translate (FIG. 3, element 218; Specification 10:14-23) the Traditional Chinese character into an accented Pin Yin word and an English word;

instructions for, responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin (Spec. 7:15-16) word, a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 46 provide a program product operable on a computer, the program product comprising:

a computer-usable medium containing instructions encoded thereon and executable on a computer having a display and connected to the Internet comprising:

instructions for receiving (FIG. 3, elements 204 and 220; Specification 8:22-9:16, 11:1-7, and 11:22-13:4) a Pin Yin word in an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

instructions for using Unicode to translate (FIG. 3, element 222; Specification 11:1-7) the Pin Yin word into a Traditional Chinese character, a Simplified Chinese character, and an English word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the Pin Yin word as a Traditional Chinese

character, an unaccented Pin Yin (Spec. 7:15-16) word, a hybrid Pin Yin (Spec. 7:12-14) word, and an English word.

Embodiments of the invention according to claim 53 provide a program product operable on a computer, the program product comprising:

a computer-usable medium containing instructions encoded thereon and executable on a computer having a display and connected to the Internet comprising:

instructions for receiving (FIG. 3, elements 204 and 224; Specification 8:22-9:16, 11:8-14, and 11:22-13:4) an English word as an input field (FIG. 4, element 302; Specification 11:22-13:11) of a graphical user interface (FIG. 4, element 300; Specification 11:22-12:9);

instructions for using Unicode to translate (FIG. 3, element 226; Specification 11:8-14) an English word into a Traditional Chinese character, a Simplified Chinese character, and an accented Pin Yin word;

responsive to a user activation of a single control (FIG. 3, element 304; Specification 12:10-13:11) on the graphical user interface, simultaneously displaying (FIG. 3, element 230; Specification 11:18-21) the English word as a Traditional Chinese character, an unaccented Pin Yin (Spec. 7:15-16) word, and a hybrid Pin Yin (Spec. 7:12-14) word.

VII. Argument

A. First Ground of Rejection

Claims 1-7, 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57 on the ground of nonstatutory obviousness-type double patenting over claims 1-30 of copending Application No. 10/617,530 (the '530 Application) in view of the Mandarintools Web Pages. Office Action pp. 2-5.

The analysis employed in an obviousness-type double patenting rejection parallels the guidelines for analysis of a 35 U.S.C. 103 obviousness determination. *In re Braat*, 937 F.2d 589, 19 USPQ2d 1289 (Fed. Cir. 1991); *In re Longi*, 759 F.2d 887, 225 USPQ 645 (Fed. Cir. 1985). Thus, the factual inquiries set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966), are employed when making an obvious-type double patenting analysis and would require determining the differences between the scope and content of the patent claim as determined in (A) and the claim in the application at issue. *See* M.P.E.P. 804 II. B. 1. In determining the differences between the prior art and the claims in an obviousness analysis, the question under 35 U.S.C. 103 is whether the claimed invention as a whole would have been obvious. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983). Distilling an invention down to the "gist" or "thrust" of an invention disregards the requirement of analyzing the subject matter "as a whole." *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984).

Claims 1-7

The rejection is improper for at least three reasons. First, the Instant Application recites "to translate ... into accented Pin Yin word" and "displaying ... an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word" yet the '530 Application fails to recite any similar features or limitations. The Examiner alleges the Chinese-English Dictionary Web Page remedies this deficiency. Office Action p.4. The combination fails to teach these limitations because the Chinese-English Dictionary Web Page is silent to displaying "an unaccented Pin Yin word" and "a hybrid Pin Yin word," as set forth in the claim. The Chinese-English Dictionary Web Page teaches "[r]esults will show the Chinese word, the pinyin representation of the word, and the English definition, yet is silent to "an unaccented Pin Yin word" and "a hybrid Pin Yin word." Hence, at best, the Chinese-English Dictionary Web Page's "pinyin representation" would meet one of the claim's "unaccented Pin Yin word" or "hybrid Pin Yin word," but not a "unaccented Pin Yin word" and a "hybrid Pin Yin word." Furthermore, though the Chinese-English Dictionary Web Page teaches results shown in a "pinyin representation," the Chinese-English Dictionary Web Page is silent to results shown in an "unaccented" pinyin representation and is also silent to results shown in a "hybrid" pinyin representation. Hence, claim 1 comprises features and limitations that are outside the scope of the '530 Application's claim 1 in view of the Mandarintools Web Pages.

Second, neither the Instant Application's claim 1 nor the '530 Application's claim 1 dominate because each Applications' claim 1 comprises features and limitations that are outside the scope of the other application. The Examiner alleges the Instant Application's claim 1 in view of the Mandarintools Web Pages teaches the limitations of the '530 Application's claim 1. Office Action pp. 2-5. The '530 Application's claim 1

recites "recognizing the Simplified Chinese character without regard to an encoding format of the Simplified Chinese character," yet the Instant Application's claim 1 fails to recite any similar features or limitations. The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. As discussed above, claim 1 comprises features and limitations that are outside the scope of the '530 Application's claim 1 in view of the Mandarintools Web Pages. Hence, the Instant Application's claim 1 comprises features and limitations that are outside the scope of and '530 Application's claim 1, and vice versa.

Third, the Examiner fails to analyze the subject matter as a whole because the Examiner distills the invention down to a gist or thrust. Specifically, the Examiner distills the Instant Application's invention to "finding the corresponding equivalent Chinese Character ... , the corresponding Pin Yin word, and/or an English word to any given word" and the '530 Application's invention to "finding the corresponding Chinese character ... to a given Chinese word." Office Action p.4. Appellant respectfully notes the claims of the Instant Application and of the '530 Application contain many more features and limitations than what the Examiner's stated gists of the invention comprise. Hence, the reasoning is improper because the Examiner did not consider all the features and limitations of the claims as a whole.

Thus, the Instant Application comprises features and limitations that are outside the scope of the '530 Application and the Examiner's reasoning was improper. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 2-7 each depend from and inherit all the limitations of claim 1. As discussed above, claim 1 comprises features and limitations that are outside the scope of

the '530 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Thus, claims 2-7 comprise features and limitations that are outside the scope of the '530 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Therefore Appellant respectfully requests that the rejection be reversed.

Claims 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57

Any obviousness-type double patenting rejection should make clear the reasons why a person of ordinary skill in the art would conclude that the invention defined in the claim at issue would have been an obvious variation of the invention defined in a claim in the patent. M.P.E.P. 804 II. B. 1. The Examiner provides no reasoning to support the rejection of claims 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57. *See* Office Action pp. 2-5. Rather, the Examiner merely lists claim 1 and its dependent claims in the reasoning supporting the rejection. Thus, the Examiner did not make clear the reasons why the '530 Application's claims would have been an obvious variation of the Instant Application's claims 9-15, 17-22, 24-28, 30-36, 38-44, 46-51, and 53-57. Therefore, Appellant respectfully requests that the rejection be reversed.

B. Second Ground of Rejection

Claims 1-3, 9-11, 17, 24, 30-32, 38-40, 46, and 53 stand rejected on the ground of nonstatutory obviousness-type double patenting over claims 1, 5-7, 26, and 30-32 of copending Application No. 10/631,070 (the '070 Application) in view of the Mandarintools Web Pages. Office Action pp. 5-6. Appellant notes the rejection states "claims 1-3, 8-11, 16-17, 23-24, 29-32, 37-40, 45-46, 52-53, and 58" are rejected, but

that claims 8, 16, 23, 29, 37, 45, 52, and 58 are canceled. Thus, Appellant interprets this rejection as applying to claims 1-3, 9-11, 17, 24, 30-32, 38-40, 46, and 53.

Claims 1-3 and 8

The rejection is improper for at least three reasons. First, the reasoning provided by the Examiner is improper. The Examiner's reasoning merely states the conflicting claims "are not patentably distinct from each other because the above-mentioned claims of copending Application No. 10/617,526 anticipate the claims of the current Application." Appellant respectfully notes the "current Application" is Application No. 10/617,526. Hence, the Examiner is stating that the claims of the Instant Application anticipate the claims of the Instant Application, which is clearly improper.

Second, the Instant Application's claim 1 comprises features and limitations that are outside the scope of the '070 Application's claim 1. The Examiner alleges the '070 Application's claim 1 in view of the Mandarintools Web Pages teaches the limitations of the Instant Application's claim 1. Office Action pp. 5-6. The Instant Application's claim 1 recites "displaying ... an unaccented Pin Yin word, [and] a hybrid Pin Yin word," yet the '070 Application's claim 1 fails to recite any similar features or limitations. The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, claim 1 comprises features and limitations that are outside the scope of the '070 Application's claim 1 in view of the Mandarintools Web Pages.

Third, neither the Instant Application's claim 1 nor the '070 Application's claim 1 dominate because each Applications' claim 1 comprises features and limitations that are outside the scope of the other application. The '070 Application recites "determining if the user input is an entire desired word, a beginning of the entire word, or whether the

user input appears anywhere in the desired word" and "searching a dictionary for an entry containing a Simplified Chinese word," yet the Instant Application fails to recite any similar features or limitations. The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. As discussed above, claim 1 comprises features and limitations that are outside the scope of the '570 Application's claim 1 in view of the Mandarintools Web Pages. Hence, the Instant Application's claim 1 comprises features and limitations that are outside the scope of and '570 Application's claim 1, and vice versa.

Thus, the Instant Application comprises features and limitations that are outside the scope of the '070 Application and the Examiner's reasoning was improper. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 2-3 and 8 each depend from and inherit all the limitations of claim 1. As discussed above, claim 1 comprises features and limitations that are outside the scope of the '070 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Thus, claims 2-3 and 8 comprise features and limitations that are outside the scope of the '070 Applicant in view of the Mandarintools Web Pages and the reasoning for the rejection is improper. Therefore Appellant respectfully requests that the rejection be reversed.

Claims 9-11, 17, 24, 30-32, 38-40, 46, and 53

Any obviousness-type double patenting rejection should make clear the reasons why a person of ordinary skill in the art would conclude that the invention defined in the claim at issue would have been an obvious variation of the invention defined in a claim in the patent. M.P.E.P. 804 II. B. 1. The Examiner provides no reasoning to support the

rejection of claims 9-11, 17, 24, 30-32, 38-40, 46, and 53. *See* Office Action pp. 2-5. Rather, the Examiner merely lists claim 1 and its dependent claims in the reasoning supporting the rejection. Thus, the Examiner did not make clear the reasons why the '070 Application's claims would have been an obvious variation of the Instant Application's claims 9-11, 17, 24, 30-32, 38-40, 46, and 53. Therefore, Appellant respectfully requests that the rejection be reversed.

C. Third Ground of Rejection

The rejection of claims 1-4, 6-7, 9-12, 14-15, 17-20, 22, 24-26, 28, 30-33, 35-36, 38-41, 43-44, 46-49, 51, 53-55, and 57 under 35 U.S.C. 103(a) over the Mandarintools Web Pages in view of the CEL Web Page and the Foolsworkshop Web Page. Office Action pp. 7-10. In rejecting claims under 35 U.S.C. § 103, it is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. *See In re Fine*, 837 F.2d 1071, 1073, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). In so doing, the Examiner must make the factual determinations set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 17, 148 USPQ 459, 467 (1966), *viz.*, (1) the scope and content of the prior art; (2) the differences between the prior art and the claims at issue; and (3) the level of ordinary skill in the art. "[T]he examiner bears the initial burden, on review of the prior art or on any other ground, of presenting a *prima facie* case of unpatentability." *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). Furthermore, "'there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness' . . . . [H]owever, the analysis need not seek out precise teachings directed to the specific subject matter of the challenged claim, for a court can take account of the inferences and creative steps that a person of ordinary skill

in the art would employ." *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1741, 82 USPQ2d 1385, 1396 (2007) (quoting *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006)). Obviousness is then determined on the basis of the evidence as a whole and the relative persuasiveness of the arguments. *See Oetiker*, 977 F.2d at 1445, 24 USPQ2d at 1444; *Piasecki*, 745 F.2d at 1472, 223 USPQ at 788.

Claims 1-4 and 6-7

Claim 1 recites "copying a Simplified Chinese character into an input field of a graphical user interface." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.7. The combination fails to teach these limitations because the CEL Web Page fails to teach "into an input field," as set forth in the claim. The Examiner interprets the CEL Web Page's depiction of a "Search" menu item (CEL Web Page, p.1, in the window titled "Charlotte's Web - Notepad") as meeting the claim's "input field" (Office Action p.7), yet the CEL Web Page is silent to copying a Simplified Chinese character into its Search menu item. Furthermore, the CEL Web Page teaches "the user has selected and copied a word" and that the CEL Web Page's system "detect[s] the word on the Windows Clipboard" (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from the Windows Clipboard. The CEL Web Page's copying to the Windows Clipboard does not meet the claim's "copying ... into an input field" at least because the Windows Clipboard is not an "input field," as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 1 also recites "simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word,

and an English word." The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action pp. 8. The CEL Web Page fails to teach these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word "斧頭" (the two characters selected in the window titled "Charlotte's Web – Notepad") and displaying that same word with Pin Yin and English translations (the window titled "CEL (Chinese/English Lookup) …"). However, the Chinese characters in the window titled "CEL (Chinese/English Lookup) …" are the same as the selected Chinese characters in the window titled "Charlotte's Web – Notepad." In other words, the word selected is a Traditional Chinese character, not a Simplified Chinese character, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin ("fu3" for the first Traditional Chinese character (斧) and "tou2" for the second Traditional Chinese character (頭)), whereas the claim recites "an unaccented Pin Yin word" and "a hybrid Pin Yin word." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word."

Claim 1 also recites "responsive to a user activation of a single control … displaying." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.8. The CEL Web Page fails to teach these limitations because the CEL Web

Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The CEL Web Page teaches "CEL, having detected the word on the Windows Clipboard, has popped up to display," yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to "responsive to a user activation of a single control ... displaying," because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "responsive to a user activation of a single control ... displaying."

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 2-4 and 6-7 each depend from and inherit all the limitations of claim 1. As discussed above, claim 1 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 2-4 and 6-7 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 9-12 and 14-15

Claim 9 recites "copying a Traditional Chinese character into an input field of a graphical user interface." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The

combination fails to teach these limitations because the CEL Web Page fails to teach "into an input field," as set forth in the claim. The Examiner interprets the CEL Web Page's depiction of a "Search" menu item (CEL Web Page, p.1, in the window titled "Charlotte's Web - Notepad") as meeting the claim's "input field" (Office Action p.10 (referring to the reasoning used to reject claim 1)), yet the CEL Web Page is silent to copying a Traditional Chinese character into its Search menu item. Furthermore, the CEL Web Page teaches "the user has selected and copied a word" and that the CEL Web Page's system "detect[s] the word on the Windows Clipboard" (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from the Windows Clipboard. The CEL Web Page's copying to the Windows Clipboard does not meet the claim's "copying ... into an input field" at least because the Windows Clipboard is not an "input field," as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 9 also recites "simultaneously displaying the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word." The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word "斧頭" (the two characters selected in the window titled "Charlotte's Web – Notepad") and displaying that same word with Pin Yin and English translations (the window titled

"CEL (Chinese/English Lookup) ..."). However, the Chinese characters in the window titled "CEL (Chinese/English Lookup) ..." are the same as the selected Chinese characters in the window titled "Charlotte's Web – Notepad." In other words, the word selected is displayed as a Traditional Chinese character, not a Simplified Chinese character, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin ("fu3" for the first Traditional Chinese character (斧) and "tou2" for the second Traditional Chinese character (頭)), whereas the claim recites "an unaccented Pin Yin word" and "a hybrid Pin Yin word." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "simultaneously displaying the Traditional Chinese character as a Simplified Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word."

Claim 9 also recites "responsive to a user activation of a single control ... displaying." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The CEL Web Page teaches "CEL, having detected the word on the Windows Clipboard, has popped up to display," yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to "responsive to a user activation of a single control ... displaying," because detecting a word on the Windows Clipboard does not meet the

claim's "activation of a single control." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "responsive to a user activation of a single control ... displaying."

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 10-12 and 14-15 each depend from and inherit all the limitations of claim 9. As discussed above, claim 9 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 10-12 and 14-15 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 17-20 and 22

Claim 17 recites "entering a Pin Yin word into an input field of a graphical user interface." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The combination fails to teach these limitations because the CEL Web Page fails to teach "into an input field," as set forth in the claim. The Examiner interprets the CEL Web Page's depiction of a "Search" menu item (CEL Web Page, p.1, in the window titled "Charlotte's Web - Notepad") as meeting the claim's "input field" (Office Action p.7), yet the CEL Web Page is silent to copying a Pin Yin word into its Search menu item. Furthermore, the CEL Web Page teaches "the user has selected and copied a word" and that the CEL Web Page's system "detect[s] the word on the Windows Clipboard" (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from

the Windows Clipboard. The CEL Web Page's copying to the Windows Clipboard does not meet the claim's "copying ... into an input field" at least because the Windows Clipboard is not an "input field," as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 17 also recites "simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word." The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word "斧頭" (the two characters selected in the window titled "Charlotte's Web – Notepad") and displaying that same word with Pin Yin and English translations (the window titled "CEL (Chinese/English Lookup) ..."). However, the Chinese characters in the window titled "CEL (Chinese/English Lookup) ..." are the same as the selected Chinese characters in the window titled "Charlotte's Web – Notepad." In other words, the word selected is a Traditional Chinese character, not a Pin Yin word, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin ("fu3" for the first Traditional Chinese character (斧) and "tou2" for the second Traditional Chinese character (頭)), whereas the claim recites "an unaccented Pin Yin word" and "a hybrid Pin Yin word." The Mandarintools Web Pages are not relied upon and do not remedy

these deficiencies. Hence, the combination fails to teach "simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word."

Claim 17 also recites "responsive to a user activation of a single control ... displaying." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The CEL Web Page teaches "CEL, having detected the word on the Windows Clipboard, has popped up to display," yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to "responsive to a user activation of a single control ... displaying," because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "responsive to a user activation of a single control ... displaying."

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 18-20 and 22 each depend from and inherit all the limitations of claim 17. As discussed above, claim 17 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 18-20 and 22 comprise features and

limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 24-26 and 30

Claim 24 recites "entering an English word into an input field of a graphical user interface." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The combination fails to teach these limitations because the CEL Web Page fails to teach "into an input field," as set forth in the claim. The Examiner interprets the CEL Web Page's depiction of a "Search" menu item (CEL Web Page, p.1, in the window titled "Charlotte's Web - Notepad") as meeting the claim's "input field" (Office Action p.7), yet the CEL Web Page is silent to copying an English word into its Search menu item. Furthermore, the CEL Web Page teaches "the user has selected and copied a word" and that the CEL Web Page's system "detect[s] the word on the Windows Clipboard" (the CEL Web Page p.1, para. 2.), yet the CEL Web Page is silent to a user pasting a word to an input field from the Windows Clipboard. The CEL Web Page's copying to the Windows Clipboard does not meet the claim's "copying ... into an input field" at least because the Windows Clipboard is not an "input field," as set forth in the claim. Hence, the combination fails to teach the limitations of the claim.

Claim 24 also recites "simultaneously displaying the term as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word." The Examiner admits the Mandarintools Web Pages fails to teach these limitations and alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach

these limitations because the CEL Web Page at best teaches displaying a Traditional Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, and an English word. The CEL Web Page teaches selecting the Traditional Chinese word "斧頭" (the two characters selected in the window titled "Charlotte's Web – Notepad") and displaying that same word with Pin Yin and English translations (the window titled "CEL (Chinese/English Lookup) …"). However, the Chinese characters in the window titled "CEL (Chinese/English Lookup) …" are the same as the selected Chinese characters in the window titled "Charlotte's Web – Notepad." In other words, the word selected is a Traditional Chinese character, not an English word, as set forth in the claim. Also, the CEL Web Page merely teaches displaying one form of Pin Yin ("fu3" for the first Traditional Chinese character (斧) and "tou2" for the second Traditional Chinese character (頭)), whereas the claim recites "an unaccented Pin Yin word" and "a hybrid Pin Yin word." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "simultaneously displaying the Pin Yin word as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word."

Claim 24 also recites "responsive to a user activation of a single control … displaying." The Examiner alleges the CEL Web Page teaches these limitations. Office Action p.10 (referring to the reasoning used to reject claim 1). The CEL Web Page fails to teach these limitations because the CEL Web Page is silent to any form of control and because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The CEL Web Page teaches "CEL, having detected the

word on the Windows Clipboard, has popped up to display," yet is silent to responding to activating a control to pop up its display, much less any form of control. In other words, the CEL Web Page teaches, at best, displaying in response to detecting a word on the Windows Clipboard, yet is silent to "responsive to a user activation of a single control ... displaying," because detecting a word on the Windows Clipboard does not meet the claim's "activation of a single control." The Mandarintools Web Pages are not relied upon and do not remedy these deficiencies. Hence, the combination fails to teach "responsive to a user activation of a single control ... displaying."

Thus, the claim comprises features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 25-26 and 30 each depend from and inherit all the limitations of claim 24. As discussed above, claim 24 comprises features and limitations that are outside the scope of the combination of cited art. Thus, claims 25-26 and 30 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 30-33 and 35-36

Claims 30-33 and 35-36 comprise features and limitations similar to claims 1-4 and 6-7. As discussed above, claims 1-4 and 6-7 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 30-33 and 35-36 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 38-41 and 43-44

Claims 38-41 and 43-44 comprise features and limitations similar to claims 9-12 and 14-15. As discussed above, claims 9-12 and 14-15 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 38-41 and 43-44 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 46-49 and 51

Claims 46-49 and 51 comprise features and limitations similar to claims 17-20 and 22. As discussed above, claims 17-20 and 22 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 46-49 and 51 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Claims 53-55 and 57

Claims 53-55 and 57 comprise features and limitations similar to claims 24-26 and 28. As discussed above, claims 24-26 and 28 comprise features and limitations that are outside the scope of the combination of cited art. Thus, claims 53-55 and 57 comprise features and limitations that are outside the scope of the cited art. Therefore, Appellant respectfully requests that the rejection be reversed.
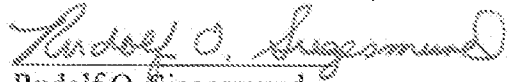
D. Fourth Ground of Rejection

Claims 5, 13, 21, 27, 34, 42, 50, and 56 under 35 U.S.C. 103(a) over the Mandarintools Web Pages in view of the CEL Web Page, the Foolsworkshop Web Page, and Hughes. Office Action pp. 10-11.

Claims 5, 13, 21, 27, 34, 42, 50, and 56 depend from and inherit all the limitations of one of claims 1, 9, 17, 24, 30, 38, 46, and 53. As discussed above, claims 1, 9, 17, 24,

30, 38, 46, and 53 comprise features and limitations that are outside the scope of the combination of the Mandarintools Web Pages, the CEL Web Page, and the Foolsworkshop Web Page. Hughes is not relied upon and does not remedy these deficiencies. Thus, claims 5, 13, 21, 27, 34, 42, 50, and 56 comprise features and limitations that are outside the scope of the combination of cited art. Therefore, Appellant respectfully requests that the rejection be reversed.

Respectfully submitted,

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